

Jason Sughrue
State Bar No. 24048150
ALLMAND LAW FIRM, P.L.L.C.
860 Airport Freeway Suite 401
Hurst, TX 76054
214.265.0123 Phone
214.265.1979 Fax
ATTORNEY FOR DEBTORS

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE: §
BRITTANY RENEE RANSOM § Case No. 23-30856-13
Debtors § Chapter 13

**MOTION TO IMPOSE THE AUTOMATIC STAY AFTER TWO PRIOR DISMISSALS
WITHIN YEAR OF FILING**

TO THE HONORABLE JUDGE OF THIS COURT:

COME NOW Debtors, **Brittany Renee Ransom**, pursuant to 11 U.S.C. §362(c)(3)(B), requesting an order continuing the automatic stay provided under 11 U.S.C. §362(a) as to all creditors. In support of this motion, Debtor(s) state as follows:

1. This Court has jurisdiction over this matter pursuant to 11 U.S.C. §105(a), 28 U.S.C. §157(b)(1), and 28 U.S.C. §1334. This matter constitutes a core proceeding as defined by 28 U.S.C. §157(b)(2).
2. Debtors filed the current petition for relief under Chapter 13 on 04/29/2023.
3. Within the twelve months prior to said filing date, Debtors were in an active Chapter 13 case, number 23-30138. Said case dismissed on Feb. 21, 2023, for Debtor failed to file Schedules, Declaration of Electronic Filing and Statement of Financial Affairs.

4. Said case was not dismissed because the Debtor failed to (a) file or amend the petition or other documents as required, or (b) provide adequate protection as ordered by the Court.
5. Debtors have no other cases pending within the twelve month period prior to 04/29/2023.
6. Debtors filed one other bankruptcy case(s) in the last eight years, 22-32174. Said case was filed on Nov. 18, 2022 and dismissed on Dec. 29, 2022, for failing to file schedules and statement of financial affairs..
7. As of the date of dismissal of Debtors' prior case(s), the following §362(d) actions were either pending or resolved by terminating, conditioning, or limiting the stay.
 - a) None.
8. Debtors filed the pending case in good faith. A substantial change in the financial and personal affairs of the Debtor has occurred since the dismissal of the previous case. In addition to having her schedules on file, the Debtor has a new job in addition to her current employment and has sufficient income to make plan payments.
9. Debtors will fully perform the terms of a confirmed plan in the pending case.
10. This motion is not made for the purposes of delay.
11. Debtor's counsel requests \$200.00 for the prosecution of this Motion.

WHEREFORE, PREMISES CONSIDERED, Debtors **Brittany Renee Ransom** and respectfully request the Court continue the stay under 11 U.S.C. §362(a) as to all creditors for the duration of this Chapter 13 proceeding, or until such time as the stay is terminated under §362(c)(1) or (c)(2), or a motion for relief from stay is granted under §362(d).

Dated: May 3, 2023

Respectfully Submitted,

ALLMAND LAW FIRM, P.L.L.C.

/s/ Jason Sughrue
Jason Sughrue
State Bar No. 24048150
ALLMAND LAW FIRM, P.L.L.C.
860 Airport Freeway Suite 401
Hurst, TX 76054
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CERTIFICATE OF CONFERENCE

The undersigned Debtors' Counsel hereby certifies a pre-filing conference was not held, because it was not possible to confer with all scheduled creditors, given the time constraint imposed by 11 U.S.C. §362(c)(3)(B), requiring a hearing be completed before the expiration of the thirty-day period after filing of the petition. It is presumed this motion is opposed.

By: /s/ Jason Sughrue
Jason Sughrue
State Bar No. 24048150

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on May 3, 2023, a true and correct copy of the foregoing was served on all parties in interest below and on the attached mailing matrix.

DEBTORS

Brittany Renee Ransom
166 Yale Ave
Red Oak, TX 75154

STANDING CHAPTER 13 TRUSTEE

Tom Powers
105 Decker Ct., 11th Flr., Ste. 1150
Irving, Texas 75062

U.S. TRUSTEE

Rm. 976
1100 Commerce Street
Dallas, TX 75242

U.S. ATTORNEY GENERAL

Main Justice Building, Rm. 5111
10th & Constitution Ave
NW Washington D.C. 20530

By: /s/ Jason Sughrue

Jason Sughrue
State Bar No. 24048150